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Attorney for Defendant
VICTOR HERNANDEZ PENA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA)	CASE NO. 1:21-CR-00090-JLT
)	
Plaintiff,)	STIPULATION TO CONTINUE
)	CHANGE OF PLEA HEARING
v.)	
)	
VICTOR HERNANDEZ PENA,)	
)	
Defendant.)	
)	

Defendant, VICTOR HERNANDEZ PENA, by and through counsel of record,
NICHOLAS F. REYES, and Plaintiff, UNITED STATES OF AMERICA, by and through
its counsel of record, STEPHANIE STOKMAN, Assistant United States Attorney for the
Eastern District of California, hereby stipulate as follows:

The parties hereby stipulate to continue the Change of Plea hearing from February 24,
2025 to May 19, 2025.

The parties anticipate entering into and filing a plea agreement in this matter. Defendant
has been dealing with serious health issues that have delayed the filing of the plea agreement.
Defendant has a heart condition which has him undertaking medical treatment procedures at

1 Stanford Medical Center. He is scheduled to have a CT imaging procedure on February 25, 2025
2 at Stanford Medicine in preparation for his upcoming heart surgery.

3
4 The parties stipulate that the period of time until May 19, 2025, is deemed
5 excludable pursuant to 18 U.S.C. §3161(h)(7)(A) and 3161 (h)(7)(B)(i) and (iv) because it
6 results from a continuance granted by the Court at defendant's request on the basis of the Court's
7 finding that the ends of justice served by taking such action outweigh the best interest of the
8 public and the defendant in a speedy trial.

9
10 Nothing in this stipulation and order shall preclude a finding that other provisions of the
11 Speedy Trial Act dictate that additional time periods are excludable from the period within
12 which a trial must commence.

13
14 For the reasons set forth above and based on good cause the parties agree that the change
15 of plea hearing be continued from February 24, 2025 to May 19, 2025 at 9:00 a.m.

16 IT IS SO STIPULATED.

17
18 Dated: February 20, 2025

/s/ Stephanie Stokman
STEPHANIE STOKMAN, AUSA

19
20 Dated: February 20, 2025

/s/ Nicholas F. Reyes
NICHOLAS F. REYES, ESQ.

21
22
23 IT IS SO FOUND.

24 IT IS SO ORDERED.

25 Dated: February 21, 2025


UNITED STATES DISTRICT JUDGE